



June 18, 2003

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, MA 02110

Re: D.T.E. 01-20 Comments of Conversent Communications of Massachusetts, LLC in Connection with Verizon Massachusetts Revised Compliance Filing

Dear Ms. Cottrell:

Conversent Communications of Massachusetts, LLC ("Conversent") respectfully urges the Department of Telecommunications and Energy (the "Department") to set a deadline by which Verizon Massachusetts must certify to the Department that it has made the necessary changes to its billing system in order to correctly bill the new rates that result from this proceeding. Conversent believes this is necessary so that competitive local exchange carriers ("CLECs") can be assured that they will receive i) an appropriate one-time adjustment to account for the rate changes for all of the wholesale services they have ordered, retroactive to August 5, 2002¹, and ii) an accurate bill for the wholesale services they order on a going forward basis.

Conversent is concerned that if Verizon does not promptly and accurately provide it with an accounting that contains the proper adjustments (and support) to its wholesale bills, retroactive to August 5, 2002, Conversent will become mired in protracted billing disputes with Verizon. Similarly, if Verizon does not promptly provide Conversent with an accurate bill going forward, it too may result in lengthy and protracted billing disputes. Accordingly, Conversent believes that Verizon should be required to make the necessary changes to its billing systems within 90 days of a Final Order on the revised compliance filing, so that CLECs get both a proper accounting of the adjustments made for past charges and accurate bills going forward.

Conversent also seeks clarification about when the Department plans to open an investigation into the pricing of Verizon's alternative hot-cut process, known as WPTS.

Thank you for your attention to this matter.

Sincerely,

/s/

Scott Sawyer
Vice President and Counsel
SS/pf
CC: Service List

¹ An exception is the hot-cut NRC which will not be changed from the existing rates in DTE 17 until the Department approves the process and rates for WPTS.